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July 2, 2024

By ECF

Hon. Philip M. Halpern, U.S.D.J.
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Wolf et al. v. Dolgen New York, LLC*
Case No. 7:23-cv-00558-PMH
Request to Adjourn Summary Judgement Pre-Motion Conference

Dear Judge Halpern,

We represent defendant Dolgen New York, LLC (“Dollar General”) in the above referenced matter. We write to respectfully request that the pre-motion conference concerning Dollar General’s summary judgment motion, scheduled on August 13, 2024, be adjourned and rescheduled. Plaintiffs consent to this request.

On June 24, 2024, Dollar General requested that the case management conference, which was originally scheduled for June 18, 2024 and *sua sponte* adjourned to July 22, 2024, be rescheduled. (ECF 066). In doing so, counsel for Dollar General inadvertently included August 13, 2024 as an alternate date to reschedule the case management conference, which is the date the Court selected. (ECF 067). On June 27, 2024, the Court converted the August 13, 2024 case management conference to a pre-motion conference to address Dollar General’s summary judgment motion. (ECF 069).

Dollar General requests an adjournment of the August 13, 2024 pre-motion conference because Trent Taylor, lead counsel for Dollar General, is scheduled to appear in-person for a mediation before Bob Boston in a matter pending in Nashville, Tennessee that same day. Accordingly, Dollar General respectfully requests that the pre-motion conference be adjourned to a date and time on which Mr. Taylor is available to attend.

Counsel for the parties have conferred and are available on the following dates to reschedule the pre-motion conference: August 7, 8, 9, 16, 21, 28, 29, and 30. This is any party’s first request for an adjournment of the August 13, 2024 summary judgment pre-motion conference. No other deadlines are affected by this request. Thank you for your consideration on this matter and we apologize for any inconvenience to the Court.

Respectfully submitted,
/s/ Philip A. Goldstein
Philip A. Goldstein

cc: All Counsel of Record (via ECF)